

MANNER AND MEANS

The ways, manner and means by which the foregoing objective of the conspiracy to commit bank fraud were to be accomplished, included but were not limited to the following:

- a. The primary purpose of the conspiracy was for defendant **EGLAND NOEL** and other co-conspirators to illegally obtain money by presenting and using counterfeit access devices, linked to Navy Federal Credit Union deposit accounts, in order to purchase money orders, and then cashing those money orders at a separate location.
- b. It was further part of the conspiracy that defendant **EGLAND NOEL** and other co-conspirators used those counterfeit access devices as debit cards in the purchase of money orders in Missouri;
- c. It was further part of the conspiracy that defendant **EGLAND NOEL** and other co-conspirators cashed the money orders at separate locations.
- d. It was further part of the conspiracy that defendant **EGLAND NOEL** and other co-conspirators used counterfeit access devices in order to purchase money orders in the Eastern District of Missouri, well knowing that the access devices were counterfeit.
- e. It was further part of the conspiracy that defendant **EGLAND NOEL** and other co-conspirators cashed multiple money orders at Super Star K in Lauderdale Lakes, Florida.

In violation of Title 18, United States Code, Section 1349.

COUNT 2
(Bank Fraud)

The Grand Jury further charges that:

In or about December 2017, within the Eastern District of Missouri and elsewhere, the defendant,

EGLAND NOEL,

did knowingly execute and attempt to execute a scheme and artifice to defraud and to obtain the moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of Navy Federal Credit Union, which was a financial institution as defined in 18 U.S.C. § 20, by means of material false and fraudulent pretenses, representations, and promises, in that the Defendant used counterfeit access devices linked to various Navy Federal Credit Union deposit accounts in order to purchase money orders, well knowing that the access devices were counterfeit.

In violation of Title 18, United States Code, Section 1344.

COUNT 3
(Access Device Fraud)

The Grand Jury further charges that:

In or about December 2017, within the Eastern District of Missouri and elsewhere, the defendant,

EGLAND NOEL,

did knowingly and with the intent to defraud, use a counterfeit access device, that being a counterfeit debit card linked to a Navy Federal Credit Union account, said use affecting interstate

commerce, in that the cards were used to purchase money orders in the Eastern District of Missouri that were later cashed in the state of Florida.

In violation of Title 18, United States Code, Section 1029(a)(1).

COUNT 4
(Aggravated Identity Theft)

The Grand Jury further charges that:

In or about December 2017, within the Eastern District of Missouri and elsewhere, the defendant,

EGLAND NOEL,

did knowingly possess, transfer, and use, without lawful authority, a means of identification of another person, to wit, the debit card number of a Navy Federal Credit Union customer, during and in relation to the commission of the felony offense of bank fraud, Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1028A.

A TRUE BILL.

FOREPERSON

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